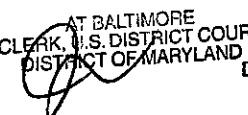


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BY  AT BALTIMORE
CLERK, U.S. DISTRICT COURT
DISTRICT OF MARYLAND DEPUTY

**AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR AN ARREST WARRANT**

I, Special Agent Johann Schlager, your Affiant, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the Department of Homeland Security, United States Secret Service (USSS) and am an investigator or law enforcement officer within the meaning of 18 U.S.C. § 2510 (7): that is, an officer of the United States Government empowered by law to conduct investigations of and to make arrests for offenses enumerated in 18 U.S.C. § 3056. Your Affiant, Johann Schlager, has been a sworn member of the USSS since 2017, and has been assigned to the Criminal Squad of the Baltimore Field Office since May of 2019.

2. During my tenure as a Special Agent, I have conducted and participated in numerous investigations of criminal activity, including, but not limited to, the investigation of counterfeiting U.S. currency, threats against the President as well as other USSS protectees, and fraud cases threatening the financial infrastructure of the United States. During the investigation of these cases, I have executed or participated in the execution of numerous search warrants, and seized evidence of these violations. I am responsible for investigations involving fraud and counterfeiting that occur in the District of Maryland. Your affiant has received training at the United States Secret Service, James J. Rowley Training Center, Beltsville, Maryland and the Federal Law Enforcement Training Center, Glynco, Georgia in the matters of counterfeiting U.S. currency, threat cases against public officials, credit card fraud, bank fraud, and identity theft.

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3. As a federal agent, your affiant is authorized to investigate violations of laws of the United States and is a law enforcement officer with the authority to execute warrants issued under the authority of the United States.

4. The statements contained in this affidavit are based on my personal knowledge or from information that I have learned in the course of my investigation, including information from financial institutions, witnesses, and others participating in the investigation.

STATEMENT OF PROBABLE CAUSE

5. On September 4, 2019, Detective (Det.) Kropff of the Laurel Police Department (LPD), Laurel Maryland, provided your Affiant with details of an investigation regarding a Jason Evans, who was identified as a suspect in a fraud attempt reported to Det. Kropff's office on August 6, 2019. On the same date, Officer Hayden of the LPD responded to conduct interviews at Capital One Bank located at 1025 Washington Boulevard, Laurel, MD.

6. Officer Hayden met with Capital One Branch Manager, Franklin Djisam, who advised an individual "JM," later identified as Jason Evans, came into the bank requesting a cash advance in the amount of \$14,400.00 from a Capital One Spark Business Visa Card, account ending 2349. Capital One's Bank policy states identification must be presented at the time a card is used. Mr. Evans provided a Pennsylvania Driver's License bearing the name "JM", a date of birth in the year 1979 and license number ending 170. In addition, the subject presented a Capital One Spark Business Visa Card bearing the name "JM" upon the front, and account number ending 2349. This card was presented to be used for a cash advance. Mr. Djisam attested that the transaction was being processed until the bank's computer system began having technical difficulties, delaying the transaction. Mr. Evans was instructed to wait until the system computer's reboot but Mr. Evans left without explanation, leaving behind the Pennsylvania

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Driver's License and Capital One Bank Card. Mr. Djisam said he was contacted subsequently by Capital One Card Services, which advised that the transaction was not approved due to the card being fraudulent.

7. Det. Kropff investigated the account used in the attempted transaction. According to Capital One, the account ending 2349 was opened online on June 29, 2019. The identifiers used to open the account included the full name of "JM," JM's date of birth in the year 1947 and his social security number ending 7832.

8. Det. Kropff further investigated the bank surveillance footage as well as background checks utilizing law enforcement databases and a motor vehicle administration query based upon the information provided on the Pennsylvania Driver's License. The investigative searches of JM initially yielded no results; however, further extensive investigation of the social security number used to open the account revealed an individual with those identifiers currently residing in Guam. The name, exact date of birth and exact social security number of JM were used in the opening of Capital One account ending 2349. Det. Kropff contacted JM in Guam and confirmed his identity via phone and JM stated he has never been to Maryland nor has a Capital One Bank Account. JM also confirmed that he does not know Mr. Evans and did not authorize anyone to use his information.

9. Surveillance footage was processed through numerous law enforcement databases and open source websites, and a subject by the name Jason Evans matched the suspect in Capital One Bank. Facial features and physical features of Mr. Evans are extremely similar to the features of the subject conducting the transaction on August 6, 2019.

10. Further, when a law enforcement alert was issued to try and identify the individual, Det. Sillaman of the Anne Arundel Police Department, Anne Arundel County,

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Maryland contacted Det. Kropff and advised that he recognized the suspect as Jason Christian Evans from a previous fraud investigation. Det. Sillamn further reported that on July 30, 2019, Mr. Evans obtained \$14,400.00 from the Capital One Business Spark Card ending 2349 at the Capital One Bank located at 7937 Ritchie Highway, Glen Burnie, Maryland. Surveillance footage and investigation also confirmed Mr. Evans was responsible for this transaction.

11. In addition, investigators learned that on July 31, 2019, charges were made on the Capital One Business Spark Card ending 2349 at the Apple Annapolis store located at 1735 Annapolis Mall, Annapolis, Maryland. Upon further investigation, surveillance footage revealed Mr. Evans was responsible for this transaction as well as others. In several of the surveillance videos Mr. Evans was wearing a distinctive green t-shirt with distinct markings.

12. On August 23, 2019, Anne Arundel Police obtained a state search warrant, which was signed by the Honorable Ronald Silkworth of the Circuit Court of Anne Arundel County. The warrant authorized the search of Mr. Evans's residence and automobile and was executed on August 26, 2019. Located in the residence was a card reader/writer, a credit card embosser, a computer, four additional fake identifications bearing Mr. Evans's picture but the PII of other individuals, opened and unopened mail addressed to other individuals (sometimes at other addresses), tax and social security documents for other people, mortgage documents belonging to other people, numerous credit cards (many counterfeit), a cell phone and the distinctive green shirt that Mr. Evans was seen wearing in various surveillance videos. There was also a business card for Absolute Home Mortgage Corp., Jason Evans, Account Executive. Located in the automobile was a second credit card embosser as well as a counterfeit social security number card with the name from one of the counterfeit identifications.

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13. Subsequently separate search warrants were obtained for the telephone and laptop, which were then searched forensically. Among the items recovered were credit card dumps, instant messages about purchases of credit card dumps, scripts and other information about “scrambling” credit card numbers (generating numbers using an algorithm).

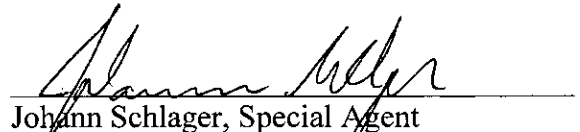
14. Capital One Bank is insured by the Federal Deposit Insurance Corporation and is headquartered in Virginia.

15. During the course of the investigation your Affiant learned that Jason Evans is currently on supervised release after serving a 48 month federal sentence for Conspiracy to Commit Bank Fraud and Aggravated Identity Theft.

CONCLUSION

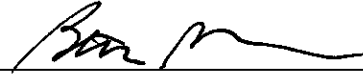
Based upon the foregoing facts and upon Affiant’s training and experience, there is probable cause to believe that Mr. Evans has engaged in bank fraud in violation of Title 18 U.S.C. § 1344; fraud in connection with identification documents in violation of Title 18 U.S.C. § 1028(a)(3); social security number fraud in violation of Title 42 U.S.C. § 408(a)(7); and aggravated identity theft in violation of Title 18 U.S.C. § 1028A. I respectfully ask that a criminal complaint be approved by this Court and a warrant issued for the arrest of Jason Christian Evans.

Respectfully submitted,


Johann Schlager, Special Agent
United States Secret Service

19-4036 BPG

Subscribed and sworn to before me by said Affiant on this the 11th day of December, 2019.



Beth P. Gesner
United States Magistrate Judge
District of Maryland

